

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JOSH FEIERSTEIN, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

CORREVIO PHARMA CORP., MARK H.N.  
CORRIGAN, WILLIAM HUNTER, JUSTIN A.  
RENTZ, and SHEILA M. GRANT,

Defendants

Case No.: 1:19-CV-11361-VEC

Honorable Valerie E. Caproni

**LEAD PLAINTIFFS' NOTICE OF UNOPPOSED MOTION AND UNOPPOSED  
MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT AND APPROVAL OF  
DISSEMINATION OF NOTICE TO THE SETTLEMENT CLASS**

Date: September 3, 2020

TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR ATTORNEYS  
OF RECORD HEREIN:

PLEASE TAKE NOTICE that Lead Plaintiffs Clinton Atkinson, Nabil Saad, and Iuliia Mironova (collectively “Lead Plaintiffs”),<sup>1</sup> will hereby move this Court on a date and time as may be designated by the Honorable Valerie Caproni, Courtroom 443, United States District Court for the Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, for an order: (i) granting Preliminary Approval of the proposed Settlement; (ii) granting approval of the form and manner of giving notice of the proposed Settlement to the Settlement Class Members; and (iii) setting a date for a final Settlement Hearing and deadlines for providing notice of the Settlement, the filing of Settlement Class Member objections, requesting exclusion from the Settlement Class, the filing of Lead Plaintiffs’ motion for final approval of the Settlement, and the filing of Lead Counsel’s application for attorneys’ fees and expenses.

This motion is based upon the accompanying Memorandum of Law, the Rosen Declaration and the exhibits thereto, and such other matters and argument as the Court may consider at the hearing on this motion. The Defendants, as defined in the Stipulation, do not oppose this motion.

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<sup>1</sup> Unless otherwise defined, all capitalized terms herein have the same meanings as set forth in the Stipulation and Agreement of Settlement dated September 3, 2020 (the “Stipulation”), which is attached as Exhibit 1 to the Declaration of Laurence Rosen (“Rosen Declaration”) that is being filed concurrently herewith.

Dated: September 3, 2020

THE ROSEN LAW FIRM P.A.

By: s/ Laurence Rosen

Laurence Rosen

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*Additional Counsel for Lead Plaintiffs and  
the proposed Settlement Class*

**CERTIFICATE OF SERVICE**

I, the undersigned say:

I am not a party to the above case, and am over eighteen years old. On September 3, 2020, I served true and correct copies of the foregoing **LEAD PLAINTIFFS' NOTICE OF UNOPPOSED MOTION AND UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT AND APPROVAL OF DISSEMINATION OF NOTICE TO THE CLASS**, by posting the document electronically to the ECF website of the United States District Court for the Southern District of New York, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on September 3, 2020 at New York, New York.

/s/ Sara Fuks  
Sara Fuks